

Honorable Thomas S. Zilly

**U.S. DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON**

STRIKE 3 HOLDINGS, LLC, a Delaware corporation,

Plaintiff,

vs.

JOHN DOE, subscriber assigned IP address 73.225.38.130,

Defendant.

Case No.: 2:17-cv-01731-TSZ

**DECLARATION OF KIREN
ROCKENSTEIN**

I, Kiren Rockenstein, declare as follows:

1. I am an attorney licensed to practice law within the States of California and Oregon. I am admitted to several district courts.
2. I am co-counsel of record for Defendant JOHN DOE, subscriber assigned IP address 73.225.38.130 (“Doe”) in this matter.
3. Plaintiff Strike 3 Holdings, LLC (“Strike 3”) filed an Ex Parte Motion for Leave To Serve A Third Party Subpoena Prior To A Rule 26(F) Conference in this matter (Dckt. No. 4). This ex parte motion was supported by the declarations of Mr. Lansky (Dckt. No. 4-2), Mr. Fieser (Dckt. No. 4-3), Mr. Pasquale (Dckt. No. 4-4), and Ms. Stalzer (Dckt. No. 4-5).
4. Mr. Pasquale and Ms. Stalzer were unfamiliar to the firm so I undertook some rudimentary online investigation to determine their identity.
5. Mr. Pasquale states in his declaration that he is a Senior Project Manager with 7 River Systems, a cyber security firm based in Maryland. (Dckt. No. 4-4 at ¶3). He is not listed on the company website for 7 River Systems.
6. Subsequent investigation into Mr. Pasquale identified him as the father of Paul Pasquale, the founder of 7 River Systems. Mr. Pasquale Senior appears to reside in New Jersey and is the President of his own consulting company, JSP Consulting Company.
7. Attached as **Exhibit 1** is a true and correct copy of the Articles of Organization of 7 River Systems, available online from the Maryland Secretary of State website, signed by a Kirsten Pasquale and Paul Pasquale.
8. Attached as **Exhibit 2** is a true and correct copy of the “About” page of the 7 Rivers website, where Paul Pasquale states he founded 7 Rivers in 2013. There is no mention of a John S. Pasquale on this site.
9. Attached as **Exhibit 3** is a true and correct copy of the information related to Kirsten E. Pasquale found online on www.whitepages.com, indicating she is related to a John S. Pasquale.
10. Attached as **Exhibit 4** is a true and correct copy of the information related to John S. Pasquale found online on www.whitepages.com, indicating he is related to a Paul Pasquale.

11. Attached as **Exhibit 5** is a true and correct copy of information related to John S. Pasquale found online on <https://www.beenverified.com>. This includes the same phone number and address provided in information related to John S. Pasquale found online on www.whitepages.com. This website also showed an email address, john.p*****@jspconsultingco.com, linked to John S. Pasquale.
12. Attached as **Exhibit 6** is a true and correct copy of the “About Us” page at the JSP Consulting Company Inc. website.
13. Attached as **Exhibit 7** is a true and correct copy of “Contact Us” page at the JSP Consulting Company Inc. website, this lists one of the addresses linked to John S. Pasquale on <https://www.beenverified.com>.
14. Attached as **Exhibit 8** is a true and correct copy of the State of New Jersey Business Name Search, listing JSP Consulting Company Inc. as a domestic profit corporation.
15. Attached as **Exhibit 9** is a true and correct copy of the LinkedIn profile page for JSP Consulting Company Inc., listing John S. Pasquale as an employee.
16. Attached as **Exhibit 10** is a true and correct copy of the LinkedIn profile page for John S. Pasquale. His profile page does not list any position at 7 Rivers Systems.
17. A similar enquiry was performed to identify Ms. Stalzer, attached as **Exhibit 11** is a true and correct copy of the LinkedIn profile page for Ms. Stalzer, listing her current position as a real estate agent. Ms. Stalzer’s LinkedIn profile does not list Strike 3 as an employer.
18. Attached as **Exhibit 12** is a true and correct copy of the declaration of David Jackson, a private investigator licensed in Illinois, who obtained confirmation that the Ms. Stalzer we located was indeed the individual who had signed the Strike 3 declaration.

I swear under the penalty of perjury under the laws of the United States of America that the above is true and correct.

Executed on: March 8, 2018

/s/ Kiren Rockenstein

Kiren Rockenstein
Declarant